

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHASE LOTFI,

Plaintiff,

v.

MCLAREN AUTOMOTIVE, INC.,

Defendant.

Case No. 1:22-cv-01658

Honorable Judge Martha M. Pacold

Honorable Magistrate Judge Jeffrey T. Gilbert

JOINT STATUS REPORT

Now come the Plaintiff, CHASE LOTFI (“Plaintiff”), and the Defendant, MCLAREN AUTOMOTIVE, INC. (“Defendant”) (collectively, the “Parties”), by and through their attorneys, and pursuant to the Court’s Order of May 10, 2022 (Doc. # 20), the Parties hereby submit the following Joint Status Report:

1. The Parties will exchange their initial disclosures on or before June 3, 2022.
2. Discovery has not been initiated by the Parties as of the date of this report.
3. The Parties suggest the following deadlines:
 - a. The Parties will serve written discovery requests on or before June 17, 2022;
 - b. The Parties will complete all fact discovery by November 23, 2022;
 - c. The Parties will exchange their initial expert witness disclosures by December 23, 2022;
 - d. The Parties will exchange their rebuttal expert witness disclosures by January 31, 2023;

e. The Parties will complete all expert witness discovery and depositions by March 3, 2023.

4. The Parties propose a deadline to file amended pleadings of October 3, 2022. The Parties propose a deadline for the filing of dispositive motions of April 3, 2023, with responses due on or before May 3, 2023, and replies due on or before May 18, 2023.

5. No settlement discussions have taken place to date. Plaintiff intends to make a settlement demand by May 27, 2022.

6. The parties are not aware of any other issues affecting the status of this case or anticipated discovery at this time.

RESPECTFULLY SUBMITTED,

/s/ David B. Levin
Attorney for Plaintiff
Law Offices of Todd M. Friedman, P.C.
111 W. Jackson Blvd., Suite 1700
Chicago, IL 60604
Phone: (224) 218-0882
Fax: (866) 633-0228
dlevin@toddflaw.com

/s/ Lisa M. Gibson (Admitted Pro Hac Vice)
Attorney for Defendant
Nelson, Mullins, Riley & Scarborough LLP
19191 S. Vermont Ave., Suite 900
Torrance, CA 90502
Phone: (424) 221-7400
Fax: (424) 221-7499
lisa.gibson@nelsonmullins.com

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2022, a copy of the foregoing Joint Status Report was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ David B. Levin
Attorney for Plaintiff